

September 20, 2013

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: Request For Waiver Of Washington Metropolitan Area Transit Authority To Apply For And Obtain Licenses For 11 Of The 700-Mhz Narrowband Reserve Channels; PS Docket 13-87

Dear Ms. Dortch:

Harris Corporation (Harris) writes to express its support for the Washington Metropolitan Area Transit Authority's (WMATA) waiver of §90.531(b)(2) of the Commission's rules and other such rules needed to allow WMATA to obtain licenses for 11 of the 700-MHz narrowband reserve channels identified in §90.531 (b)(2).¹ Harris believes that this request reflects a strong need for use of the channels in question, and is consistent with Harris' proposed policy to allow permanent use of the 700 MHz narrowband reserve channels to maximize use of this spectrum and assist in meeting the needs of T-Band users required to relocate to the 700 MHz public safety narrowband spectrum.²

As WMATA makes clear, the passage of the Middle Class Tax Relief and Job Creation Act of 2012³ altered its plans, and those of other public safety jurisdiction, to use T-Band spectrum for deployment of a new P 25 public safety system.⁴ Moreover, diligent evaluation by WMATA of frequency options for its new system revealed the following:

- 1) Use of VHF and UHF bands is not possible due to congestion of these frequencies in the region.
- 2) While state channels might be a possibility, no agreement is in place, and WMATA must move forward with its plan.
- 3) General use channels are considered, but not allotted over a large area such as WMATA.
- 4) WMATA has no reasonable alternative spectrum for implementation of the proposed system other than use of the reserved 700 MHz channels.

¹ See Request for Waiver of WMATA, PS Docket 13-87 (filed Jun. 18, 2013) (WMATA Waiver Request).

² See Comments of Harris Corporation, PS Docket No. 13-87; WT Docket No. 96-86; RM-11433; WT Docket No. 96-86; PS Docket No. 06-229; RM-11577, filed Jun. 18, 2013 (Harris 700 MHz Narrowband Comments).

³ Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, 126 Stat. 156 (2012) (requiring relocation of public safety users operating on T-Band spectrum) (Spectrum Act).

⁴ See WMATA Waiver Request at 1.

- 5) The proposed system would be a Project 25 Phase 2 system, so only 11 channels would be required to meet the capacity level of WMATA's existing radio system.⁵

It is these very circumstances that warrant use of the 700 MHz narrowband reserve channels. As noted in its Comments in the 700 MHz Narrowband proceeding, Harris strongly supports the allowance by public safety of permanent use of the reserve channels. Moreover, Harris supports this policy for the very reason WMATA seeks use of these channels: to satisfy increasing demand for 700 MHz narrowband spectrum resulting from the T-Band reallocation required under the Spectrum Act. This policy will further the public interest in meeting increasing demand for public safety 700 MHz narrowband spectrum and encouraging efficient spectrum use.

While Harris urges swift adoption of a policy allowing permanent use of the 700 MHz narrowband reserve channels, we understand that adoption of this policy may not occur in time to satisfy the immediate needs of WMATA. For this reason, Harris urges the Commission to rapidly approve the WMATA Waiver Request so that it may begin its planning of its new public safety system.

We appreciate your consideration, and urge swift action on this matter.

Respectfully submitted,

/s/

Patrick Sullivan
Director, Government Relations
Harris Corporation

⁵ See id at 1-3.

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